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Public Awareness Programs for Pipeline Operators

API RP 1162

Office of Pipeline Safety



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Today's Briefing

- ☐ **Why “Public Awareness”?**
- ☐ **Results of the Self-Assessments**
- ☐ **Who will RP 1162 affect?**
- ☐ **What does RP 1162 cover?**
- ☐ **How will RP 1162 move forward?**



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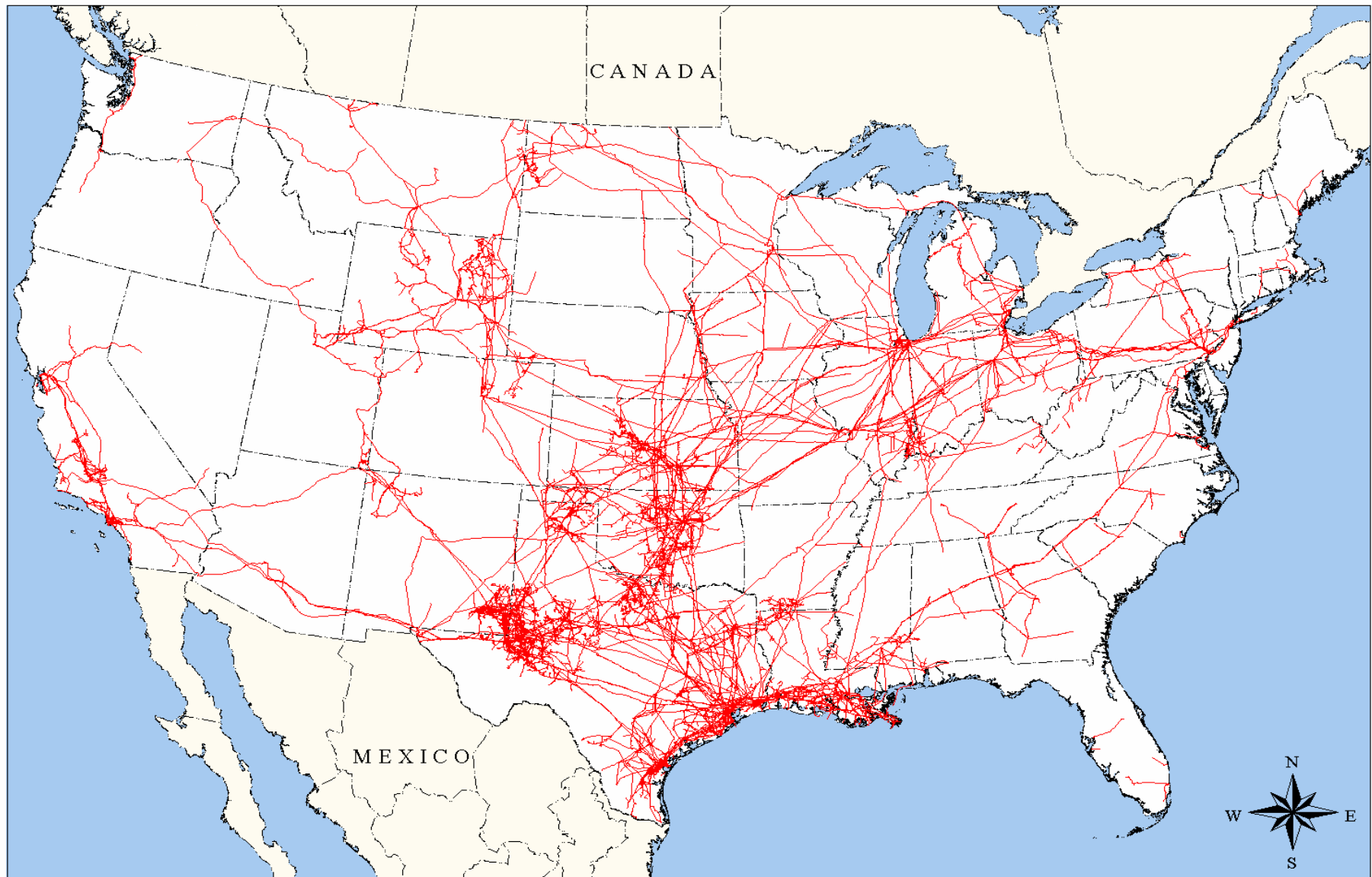
WHY?



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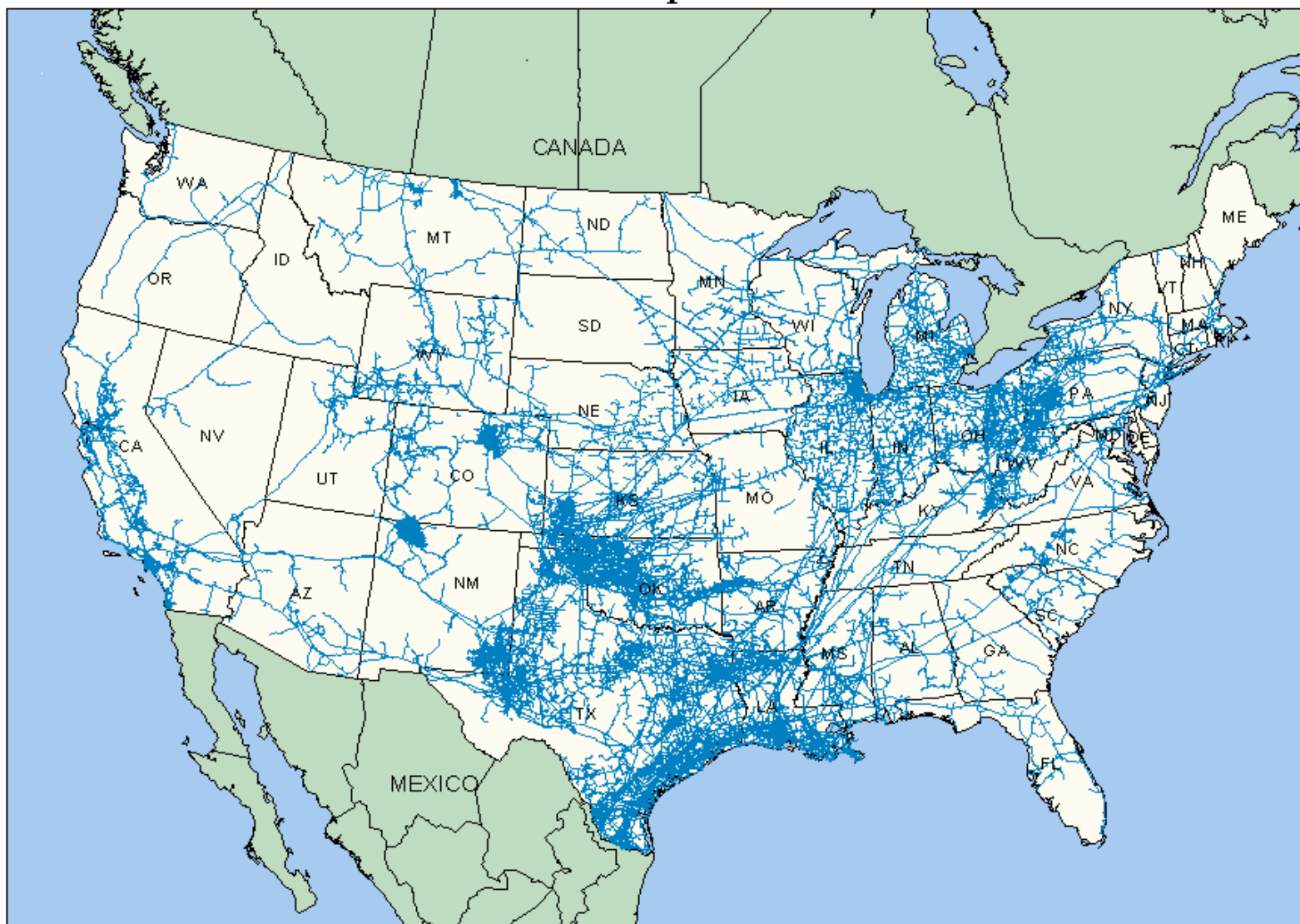


Hazardous Liquid Pipelines of the United States





Natural Gas Transmission Pipelines of the United States



— Natural Gas Transmission Pipelines





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Why RP 1162?

- ☐ OPS is committed to raising public awareness communication requirements
- ☐ Pipeline Safety Improvement Act of 2002 contains public communication provisions
- ☐ NTSB recommended public education improvements
- ☐ Gas integrity management rule communication requirements



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PSIA 2002

The Pipeline Safety Improvement Act of 2002 (PSIA-02) (Section 5b) requires that operators review their existing public education programs for effectiveness by December 17, 2003, and modify the programs as necessary.



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PSIA 2002

- ☐ The PSIA of 2002 (Section 5b) also required that operators submit their existing public education programs to the Office of Pipeline Safety or the appropriate State Agency for periodic review.
- ☐ OPS addressed the intent of this requirement through an Operator self-assessment initiative (by 12/17/03)



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Self Assessments

- ❑ 1,449 Operators responded which represented the vast majority of gas transmission and liquid pipeline Operators.
- ❑ Responses were received for:
 - o 85% of the Liquid pipeline operators
 - o 80% of the Gas Transmission pipeline operators.
 - o 68% of the Gas Distribution pipeline operators



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Self Assessments

- ☐ 91% conduct a single public education program to cover all of their systems.
- ☐ 95% were aware of the current requirements found in 49 CFR Parts 192 and 195 for operators to conduct public education programs.
- ☐ 92% currently conduct public education programs as required by the regulations.



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Self Assessments

- ☐ 90% were aware of the public education program requirements found in the PSIA-02.
- ☐ 77% had conducted initial reviews to determine the effectiveness of their public education programs in response to the PSIA-02.
- ☐ 69% had determined that modifications to their current programs were necessary
- ☐ 59% had begun making modifications to their current programs.



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General Information

- ☐ Of the 261 operators that responded to the question asking how long is expected before a program will be fully developed and implemented if the operator does not currently have a public education program:
 - 60% indicated 1 year;
 - 22% indicated 2 years;
 - 18% indicated 3 years or longer



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General Information (continued)

- ☐ A large percentage of operators have recognized the need for modifications
- ☐ A fairly large percentage of the operator programs promote the use of the one-call system
- ☐ A smaller percentage promote the other messages related to damage prevention
- ☐ *Approximately 50% of the self-assessments indicate that management support for the public education program is not "high".*



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General Information (continued)

- ☐ *Less than 30% of the operator programs require periodic development and documentation of program plans.*
- ☐ *Less than 50% of the operators require documentation of the actual program efforts.*
- ☐ *A significantly small percentage of operator programs require a periodic assessment of the program's effectiveness.*



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General Information (continued)

- ☐ A very small percentage of operators use audience surveys to measure program effectiveness.
- ☐ Follow up is needed to find out what constraints and issues will affect the operators' ability to develop and implement public education programs
- ☐ There are some indicators of where operator programs are weak but not why



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Who Will RP 1162 Affect?

- ☐ **Hazardous Liquid Pipelines
(Intrastate and Interstate)**
- ☐ **Natural Gas Transmission
Pipelines (Intrastate and Interstate)**
- ☐ **Local Distribution Pipelines**
- ☐ **Gathering Pipelines**



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Why an Industry Established Guideline on Public Awareness?

- ☐ Joint Recognized Community Awareness
(Presence of Pipelines, Products Transported
and Relevant Safety Information)
- ☐ Better Communications and Relationships
between Stakeholders
- ☐ RP 1123 for Liquids was Educational or
Reference Tool Not a Model for Operators



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Key Stakeholders

- ☐ **Affected Public**
 - Landowners, residents and places of congregation near the pipeline
- ☐ **Local and state emergency planning and response officials**
- ☐ **Local public officials and governing councils**
- ☐ **Excavators (persons or entities)**



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Consensus Process for RP 1162

- ☐ Trade Associations commented,
issued joint letter of endorsement
- ☐ API ballot (complete)
 - American National Standards
Institute
(ANSI) process, API as publisher
- ☐ OPS incorporates into Rule
*(NPRM issued 6/24/04, Docket No.
RSPA-03-15852)*



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Notice of Proposed Rulemaking (Part 192)

Section 192.616 is revised to read as follows:

§ 192.616 Public education.

Each pipeline operator shall establish a continuing public education program to enable all interested and affected parties to recognize a gas pipeline emergency, to react safely to the emergency, and to report the emergency to the operator or appropriate public officials. ***Each operator is required to develop, implement, and maintain a public education program that complies with standard API RP 1162 (IBR, see § 192.7).***



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Task Force Participation

- ☐ **Co-Sponsors**
 - American Petroleum Institute – publisher
 - Association of Oil Pipelines
 - American Gas Association
 - American Public Gas Association
 - Interstate Natural Gas Association of America
- ☐ **Regulatory Observers**
 - US DOT, Office of Pipeline Safety
 - National Association of Pipeline Safety Representatives
- ☐ **Stakeholder Input**



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Benefits of Public Awareness

- ☐ **Enhanced public safety**
- ☐ **Decreased third party damage**
- ☐ **Improved performance**
- ☐ **Enhanced emergency response coordination**
- ☐ **Improved relationships with affected public**
- ☐ **Less resistance to pipeline activities**
- ☐ **Preservation of ROW from encroachments**
- ☐ **Improved pipeline operator's reputation**



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Scope of API RP 1162

☐ Focuses On:

- Public awareness along existing pipeline routes
- Transmission, local distribution and gathering pipelines
- Framework for integrity management communications

☐ Does Not Focus On:

- Communication of operator specific performance data
- Public consultation for new pipeline construction
- Data reported to or operator history with OPS
- Data availability by OPS
- Communication following incident response



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Pipeline Operator Responsibility Public Awareness

- ☐ Pipeline Safety
- ☐ Damage Prevention
- ☐ Emergency Response
- ☐ Emergency Contacts
- ☐ General Pipeline Awareness



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Public Awareness Program Components

- ☐ Program Development
- ☐ Key Stakeholder Audiences
- ☐ Message Content
- ☐ Delivery Frequency
- ☐ Message Delivery Method and/or Media
- ☐ Recommendations for Enhancement of Baseline Program
- ☐ Program Documentation and Record Keeping
- ☐ Program Evaluation and Effectiveness
- ☐ Implement Continuous Improvement

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Public Awareness Program Process Guide

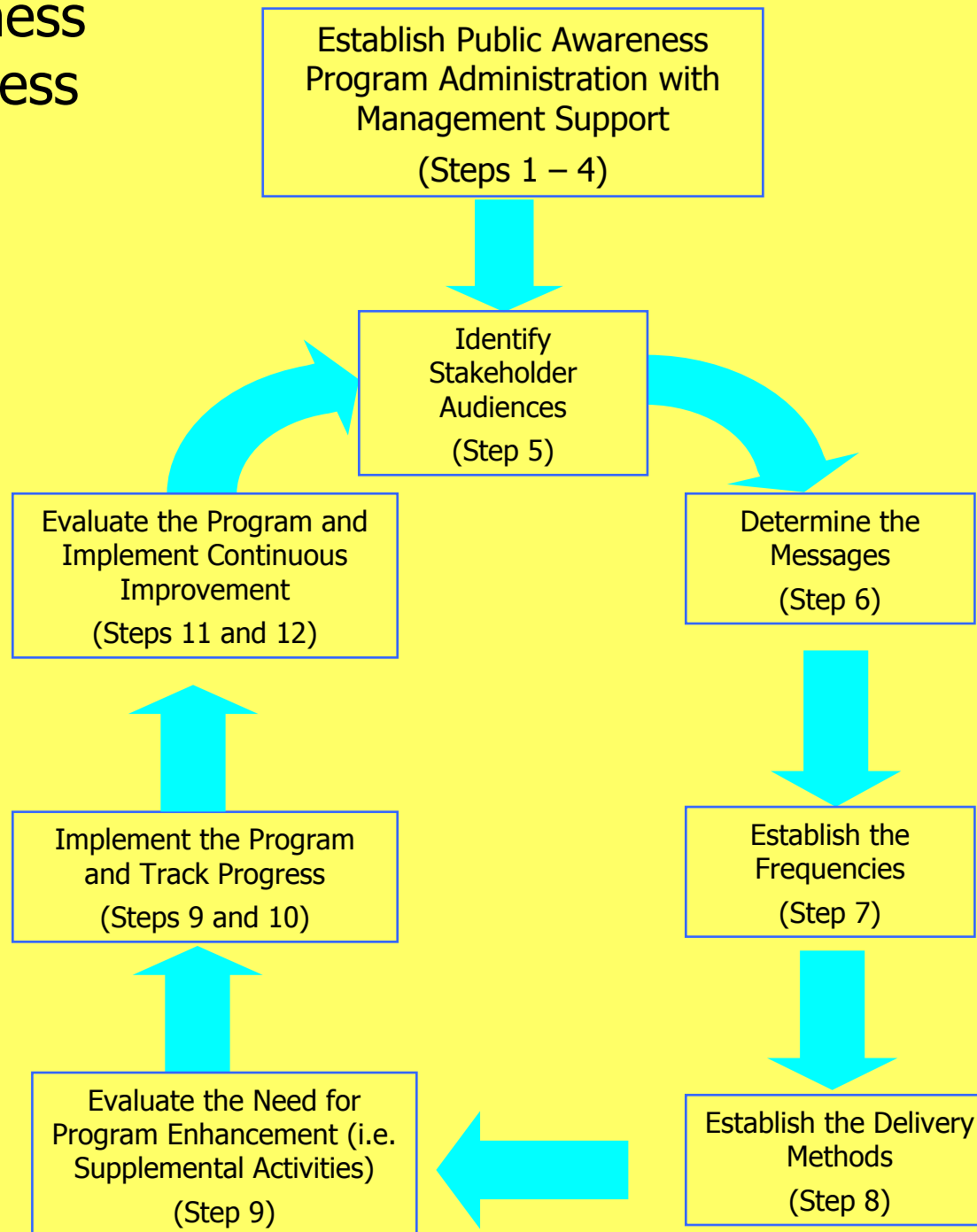


Figure 2.61



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Message Content: Baseline Program

- ☐ Pipeline purpose and reliability
- ☐ Hazard awareness and prevention measures
- ☐ Leak recognition and response
- ☐ Emergency preparedness communications
- ☐ Damage prevention
- ☐ Pipeline location



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Message Content: Baseline Program

(continued)

- ☐ **Summary of high consequence areas and integrity management plans for transmission pipelines**
- ☐ **Content of operator's websites**
- ☐ **ROW encroachment prevention**
- ☐ **Pipeline maintenance activities**
- ☐ **Security**
- ☐ **Facility purpose**



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Delivery Method and/or Media

- ☐ Print materials
- ☐ Personal contact
- ☐ Electronic communications methods
- ☐ Mass media communications
- ☐ Specialty advertising materials
- ☐ Informational or educational items
- ☐ Pipeline marker signs
- ☐ One-Call center outreach
- ☐ Operator websites



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Recommendations for Supplementing Program

- ☐ Increased communication frequency
- ☐ Supplemental efforts (additional messages and/or delivery methods)
- ☐ Broadening the stakeholder audience coverage
- ☐ Customize supplements based on pipeline or segment characteristics



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Factors to Consider to Supplement Program

- ☐ High consequence areas (HCA's)
- ☐ Pipeline release consequences
- ☐ Population density
- ☐ Land development
- ☐ Farming activity
- ☐ Third party damage incidents



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Factors to Consider to Supplement Program (continued)

- ☐ Other environmental considerations
- ☐ Pipeline segment history
- ☐ Specific location/facility
- ☐ Regulatory requirements
- ☐ Results from previous public awareness program evaluations



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Program Documentation

- ☐ Management Commitment
- ☐ Roles and responsibilities
- ☐ Responsibility for program management
- ☐ Identification of the media and methods
- ☐ Communication frequency and audience
- ☐ Supplements to baseline program
- ☐ Process for program evaluation
 - Self assessment of process
 - Evaluation of effectiveness



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Retention of Documentation

☐ What

- Lists and records of stakeholder audiences
- Copies of materials provided to stakeholder audiences
- Program evaluations, results, follow-up actions and expected results

☐ How Long

- Five Years or as defined in Operator's program



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Program Evaluation

Self Assessment

- Is your program aligned with RP 1162?
- Are you implementing your program as intended?

Measures to Evaluate Program Effectiveness

- Track number of individuals or entities reached within intended audience
- Assess the understandability of message content
- Determine if appropriate recognition, prevention and response actions by intended audience result
- Achieve reduction in third-party damage incidents

Implement Improvements

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Summary of Program Evaluation Requirements

Table 8-1

Summary of Baseline Evaluation Program

The results of the evaluation need to be considered and changes made in the public awareness program plan, implementation, materials, frequency and/or messages accordingly

Evaluation Approaches	Evaluation Techniques	Recommended Frequency
Self Assessment of Implementation	Internal review, <i>or</i> third party assessment <i>or</i> regulatory inspection	Annually
Pre-Test Effectiveness of Materials	Focus groups (in-house or external participants)	Upon design or major redesign of public education materials or messages

Summary of Program Evaluation Requirements

<p>Table 8-1</p> <p>Summary of Baseline Evaluation Program</p> <p>The results of the evaluation need to be considered and changes made in the public awareness program plan, implementation, materials, frequency and/or messages accordingly</p>		
Evaluation Approaches	Evaluation Techniques	Recommended Frequency
<p>Evaluation of effectiveness of program implementation:</p> <ul style="list-style-type: none"> • Outreach • Level of Knowledge • Changes in behavior • Bottom-line results 	<p>1.Survey: Can access outreach, knowledge and changes in behavior</p> <ul style="list-style-type: none"> ▪Operator-designed and conducted survey, <i>or</i> ▪ Use of pre-designed survey by third party or industry association, <i>or</i> ▪Trade association conducted survey segmented by operator, state or other relevant separation to allow application of results to each operator <p>1.Assess notifications and incidents to determine anecdotal changes in behavior: 2.Documented records and industry comparisons of incidents to evaluate bottom-line results.</p>	<p>Minimum interval of four years apart.</p> <p>Operator should consider more frequent as a supplement or upon major redesign of program.</p>

Summary of Program Evaluation Requirements

Table 8-1

Summary of Baseline Evaluation Program

The results of the evaluation need to be considered and changes made in the public awareness program plan, implementation, materials, frequency and/or messages accordingly

Evaluation Approaches	Evaluation Techniques	Recommended Frequency
Implement changes to the public awareness program as assessment methods above suggest.	Responsible person as designated in written public awareness program	As required by findings of evaluations.



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Conclusion

RP 1162 will “raise the performance bar” on public awareness program efforts throughout the industry

The RP establishes:

- ☐ **Baseline public awareness program recommendations**
- ☐ **Comparable standards for operators of both hazardous liquids and natural gas pipelines**
- ☐ **A consensus standard for OPS to consider for incorporation into federal regulations**



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How will RP 1162 move forward?

- ☐ OPS Publishes NPRM to incorporate by reference RP 1162
- ☐ OPS and NAPSRS develop DRAFT review criteria of current public awareness programs
- ☐ Public meeting is held to review DRAFT criteria and get constructive feedback
- ☐ OPS invites voluntary submission of existing operator public awareness programs
- ☐ OPS provides group feedback publicly
- ☐ OPS formally incorporates RP 1162 by reference
- ☐ Effective date is established for formal, required submission of pipeline operator public awareness programs
- ☐ Operators submit plans for formal review and feedback by OPS/NAPSRS